

Exhibit A

Redacted

Exhibit B

IN CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

The UNITED MEXICAN STATES, as represented
by the FINANCIAL INTELLIGENCE UNIT of the
MEXICAN MINISTRY OF FINANCE AND
PUBLIC CREDIT, and the agencies and entities it
has the power to represent,

Plaintiff,

v.

GENARO GARCIA LUNA,
LINDA CRISTINA PEREYRA DE GARCIA,
MAURICIO SAMUEL WEINBERG LOPEZ,
JONATHAN ALEXIS WEINBERG PINTO,
SYLVIA DONNA PINTO DE WEINBERG,
NATAN WANCIER TAUB,
JOSE FRANCISCO NIEMBRO GONZALEZ,
MARTHA VIRGINIA NIETO GUERRERO de
NIEMBRO,
NUNVAV, INC. S.A.,
NUNVAV TECHNOLOGIES, INC. S.A.,
GULL HOLDING ENTERPRISES, INC. S.A.,
GLAC SECURITY CONSULTING,
TECHNOLOGY, RISK MANAGEMENT S.C.,
1104 SOUTH STREET LLC,
1410 REYNOLDS, LLC,
1912 CENTURY LLC,
274 SIGB LLC,
2903 PEN II LLC,
ASSETS FINANCING SERVICES LLC,
ASW HOLDINGS, LLC,
AWOFFICE INC,
AWP VILLAGE BAY II LLC,
BELLINI WI 1501, CORP.,
BEST FRIENDS MIDTOWN LLC,
BEST FRIENDS SINCE 1880, L.L.C.,
BRILL 5002 II, LLC,
DELTA INTEGRATOR LLC,
GL & ASSOCIATES CONSULTING LLC,

CASE NO:

Complex Business Litigation
Division

ICON BRICKELL 3802, LLC,
JADE OCEAN 3203 II, LLC,
JADE OCEAN 3603, LLC,
JAGRA LLC,
ONLY BEST PROPERTIES CORP,
PENINSULA CAS II LLC,
PENINSULA MAS II LLC,
PENINSULA SMS, LLC,
PENINSULA SNDS, LLC,
PENINSULA SSW II, LLC,
PENINSULA STECAR II LLC,
PENINSULA SW II, LLC,
THE POINT 54, LLC,
RESTAURANTS & BEVERAGE OPERATOR
LOS CEDROS LLC d/b/a OGGI CAFFE,
RUBY DYNASTY TRUST,
SDSW DYNASTY TRUST,
SUNSHINE DYNASTY TRUST,
VFST, LLC,
W GOURMET GROUP L.L.C., and
WANCIER 2017 FAMILY TRUST,

Defendants.

COMPLAINT

COMES NOW the Plaintiff, the UNITED MEXICAN STATES, as represented by the Financial Intelligence Unit of the Mexican Ministry of Finance and Public Credit, and the agencies and entities it has the power to represent, by and through the undersigned attorneys, and sues the Defendants, and alleges:

Nature of Action

1. This is an action brought by the UNITED MEXICAN STATES (“MEXICO”), arising out of violations of Florida’s Civil Remedies for Criminal Practices Act, Florida Statutes § 772.101 et seq., Florida’s Uniform Fraudulent Transfer Act, Florida Statutes § 726.101 et seq., Florida’s Civil Theft Statute, Florida Statute § 772.11, requests for injunctive relief pursuant to Florida Statute

§ 895.05, and common-law claims for unjust enrichment/constructive trust, conversion, and injunctive relief.

2. Plaintiff is seeking to recover at least USD \$250,000,000 stolen from the government of MEXICO by its former *Secretario de Seguridad Pública* [Minister of Public Security] GENARO GARCIA LUNA (“GARCIA LUNA”) and his coconspirators who concealed the funds stolen from the government of MEXICO and the proceeds thereof and hindered the recovery thereof by laundering the proceeds through the transfer of the stolen funds out of Mexico to bank accounts in Barbados, the United States, and elsewhere. GARCIA LUNA and his coconspirators committed these acts at least in part while in Miami-Dade County, Florida.

3. As described herein, GARCIA LUNA and his coconspirators then used these stolen funds to acquire, control, and/or maintain a large and sophisticated money-laundering Enterprise, principally through the purchase and maintenance of personal and real property located in Florida and elsewhere. Significant amounts of the real property acquired in the money-laundering scheme are located in Miami-Dade County, Florida.

The Parties

4. MEXICO is a sovereign nation, the *Estados Unidos Mexicanos*. MEXICO is a federal republic, and its administrative branch is headed by the President of MEXICO. The Mexican government administration is carried out through constitutional *Secretarías* [Ministries] or departments and other agencies created under Mexican law.

5. The *Secretaría de Hacienda y Crédito Público* [Mexican Ministry of Finance and Public Credit] of MEXICO is the primary financial actor of the government of MEXICO. The *Unidad de Inteligencia Financiera* [“UIF” or “Financial Intelligence Unit”] has been appointed and empowered by MEXICO and the Mexican Ministry of Finance and Public Credit to pursue claims

related to the recovery of the proceeds of crime and money laundering in Mexico and abroad.

Accordingly, in this action, the UIF acts on behalf of MEXICO and the Mexican Ministry of Finance and Public Credit, and it is empowered with the authority to take any action, including the present action, to recover assets unlawfully taken from the government of MEXICO.

6. Defendant GARCIA LUNA was indicted on December 4, 2019, and is currently in United States federal custody awaiting the outcome of unrelated criminal proceedings in the Eastern District of New York in case number 1:19-cr-00576-BMC. Upon information and belief, Defendant GARCIA LUNA is a resident of Miami-Dade County, Florida.

7. Defendant LINDA CRISTINA PEREYRA DE GARCIA (“PEREYRA DE GARCIA”) is the wife of Defendant GARCIA LUNA and is a resident of Miami-Dade County, Florida.

8. Defendant MAURICIO SAMUEL WEINBERG LOPEZ (“WEINBERG LOPEZ”) is a business associate and coconspirator of Defendant GARCIA LUNA and is a resident of Miami-Dade County, Florida.

9. Defendant JONATHAN ALEXIS WEINBERG PINTO (“WEINBERG PINTO”) is the son of Defendant WEINBERG LOPEZ, is a business associate and coconspirator of Defendant GARCIA LUNA, and is a resident of Miami-Dade County, Florida.

10. Defendant SYLVIA DONNA PINTO DE WEINBERG (“PINTO DE WEINBERG”), is the wife of Defendant WEINBERG LOPEZ, is a business associate and coconspirator of Defendant GARCIA LUNA, and is a resident of Miami-Dade County, Florida.

11. Defendant NATAN WANCIER TAUB (“WANCIER TAUB”) is a business associate and coconspirator of Defendants GARCIA LUNA, WEINBERG LOPEZ, and WEINBERG PINTO and is a resident of Miami-Dade County, Florida.

53. GARCIA LUNA has been arrested and charged in the Eastern District of New York for several offenses unrelated to the illegal contracting and money-laundering scheme alleged herein.

54. Through the Enterprise, and to further augment and compartmentalize the Enterprise, GARCIA LUNA created a group of companies to hold title to multiple parcels of real estate located in Florida and elsewhere, as well as to hold title to multiple automobiles. Each of the UNITED STATES PROPERTY DEFENDANTS is a Defendant herein, and each of the PROPERTY DEFENDANTS were formed and operated as alter egos and mere instrumentalities of GARCIA LUNA in order to perpetrate a fraud on his creditors. GARCIA LUNA and/or his coconspirators have caused the same group of accomplices to act as managers, members, officers, and/or directors of each of the PROPERTY DEFENDANTS, none of which observe legal formalities and/or statutory requirements, but instead are used for the personal purposes of GARCIA LUNA and his coconspirators.

55. Examples of the companies created, directly or indirectly, by GARCIA LUNA as part of the Enterprise include but are not limited to Defendant GLAC SECURITY CONSULTING, TECHNOLOGY, RISK MANAGEMENT S.C., and Defendant GL & ASSOCIATES CONSULTING LLC.

56. GARCIA LUNA actively conspired with each other Defendant herein to coordinate, manage, and/or control the Enterprise. The logistics of coordinating and accounting for the multiple acquisitions, control, maintenance, and/or management of the Enterprise require and demonstrate that there was constant communication and coordination with the other PRINCIPAL DEFENDANTS, the PROPERTY DEFENDANTS, and persons working on their behalf. This communication and coordination continues to this day.